

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AMIR HUSSAIN

Plaintiff,

v.

CABOT PERFORMANCE MATERIALS,
INC. a Division of CABOT
CORPORATION

Defendant.

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NO: 02-CV-3825

JURY TRIAL DEMANDED

**MOTION TO COMPEL ANSWERS TO PLAINTIFF'S
INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS ADDRESSED TO DEFENDANTS**

Plaintiff, Amir Hussain, through his counsel, hereby files this Motion to Compel Answers to Interrogatories and Request for Production of Documents and avers the following in support thereof:

1. On July 25, 2002 Plaintiff served Interrogatories Addressed to Defendant. On July 25, 2002, Plaintiff served Request for Production of Documents Addressed to Defendant.
2. Pursuant to the applicable Rules of Civil Procedure, Defendant's responses were due on or before August 23, 2001.
3. On August 20, 2002, Defense counsel requested and Plaintiff's counsel agreed to an extension until September 9, 2002, for responding to discovery.
4. After September 9, 2002, Defendant still had not responded to the outstanding discovery and Plaintiff's counsel sent a letter demanding immediate compliance inasmuch as this Court has a very short discovery time which ends on December 9, 2002.

5. Plaintiff must have this information in order to adequately prepare for trial.

WHEREFORE, Amir Hussain, requests that this Court enter an order compelling Defendant to serve full and complete answers without objections to the aforesaid outstanding discovery.

**POWELL, TRACHTMAN, LOGAN, CARRLE,
BOWMAN & LOMBARDO, P.C.**

By: _____
Charles V. Curley
Attorney for Plaintiff

Date: September 17, 2002

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ORDER

AND NOW, this day of , 2002, upon consideration of Plaintiff's Motion to Compel Answers to Interrogatories and Request for Production of Documents, and any response thereto, it is hereby ORDERED that the Motion is GRANTED and it is further ORDERED that Defendant shall serve full and complete answers, without objections, to all outstanding discovery within ten (10) days of the date of this Order.

BY THE COURT:

J.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AMIR HUSSAIN

Plaintiff,

v.

: NO: 02-CV-3825

CABOT PERFORMANCE MATERIALS,
INC. a Division of CABOT
CORPORATION

Defendant.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I, Charles V. Curley, Esquire, hereby certify that a true and correct copy of the foregoing Motion to Compel was served via first class mail, postage prepaid upon the following:

Karen M. Connors, Esquire
Cabot Corporation
Two Seaport Lane
Suite 1300
Boston, MA 02210-2019

**POWELL, TRACHTMAN, LOGAN, CARRLE,
BOWMAN & LOMBARD, P.C.**

Date: September 17, 2002

Charles V. Curley
Attorney for Plaintiff

LAW OFFICES

**POWELL, TRACHTMAN, LOGAN, CARRLE,
BOWMAN & LOMBARDO**

A PROFESSIONAL CORPORATION

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September 23, 2002

PLEASE REPLY TO:

KING OF PRUSSIA

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◊ALSO ADMITTED IN MD
◊ALSO ADMITTED IN DE

Office of the Clerk of Courts
United States District Court
Eastern District of Pennsylvania
601 Market Street, Room 2609
Philadelphia, PA 19106-7704

**Re: Amir Hussain v. Cabot Performance Materials, Inc.
U.S. District Court Eastern District of Pennsylvania No. 02-3825**

Dear Sir/Madam:

Enclosed please find an original and one copy of Plaintiff's Motion to Compel in the above referenced matter. Kindly file the original with the Court and return a time-stamped copy to me in the envelope provided. Thank you for your courtesy and cooperation.

Very truly yours,

Charles V. Curley

CVC:lmw

Enclosure

cc: Karen M. Connors, Esquire (w/enc.)